

1 Steve Schulte (TX SBN 24051306)

2 *Appearance Pro Hac Vice*

3 John Raggio (CA Bar No. 338261)

4 Arati Furness (CA Bar No. 225435)

5 **NACHAWATI LAW GROUP**

6 5489 Blair Road

7 Dallas, TX 75231

8 Telephone: (214) 890-0711

9 Facsimile: (214) 890-0712

10 schulte@ntrial.com

11 jraggio@ntrial.com

12 afurness@ntrial.com

13 *Counsel for Plaintiffs*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF STEVEN S.
SCHULTE IN SUPPORT OF CERTAIN
NACHAWATI PLAINTIFFS' RESPONSE
TO DEFENDANTS UBER
TECHNOLOGIES, INC., RASIER, LLC,
AND RASIER-CA, LLC'S MOTION
REGARDING "FRAUDULENT"
PLAINTIFF FACT SHEETS**

This Document Relates to:

Doe L.N v. Uber Technologies, Inc., et al.,
No. 3:24-cv-00120-CRB

Doe (T.W.) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-00559-CRB

Doe (BW) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04308-CRB

Doe (ST) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04309-CRB

Doe (A.R.) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04313-CRB

Doe (VB) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04317-CRB

DOE (KH) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04326-CRB

Date: February 13, 2026

Time: 10:00 a.m.

Courtroom: 6 – 17th Floor

1 *Doe (S.F.) v. Uber Technologies, Inc., et al.,*
2 No. 3:24-cv-04327-CRB

3 *Doe (SG) v. Uber Technologies, Inc., et al.,*
4 No. 3:24-cv-04353-CRB

5 *Doe (TW) v. Uber Technologies, Inc., et al.,*
6 No. 3:24-cv-04356-CRB

7 *Doe (SW) v. Uber Technologies, Inc., et al.,*
8 No. 3:24-cv-04364-CRB

9 *Doe (JG) v. Uber Technologies, Inc., et al.,*
10 No. 3:24-cv-04368-CRB

11 *Doe (P.C.) v. Uber Technologies, Inc., et al.,*
12 No. 3:24-cv-04374-CRB

13 *Doe (CA) v. Uber Technologies, Inc., et al.,*
14 No. 3:24-cv-05072-CRB

15 *Doe (R.D.) v. Uber Technologies, Inc., et al.,*
16 No. 3:24-cv-05074-CRB

17 *Doe (J.H.) v. Uber Technologies Inc., et al.,*
18 No. 3:24-cv-05079-CRB

19 *Doe (EB) v. Uber Technologies, Inc., et al.,*
20 No. 3:24-cv-05110-CRB

21 *DOE (AE) v. Uber Technologies, Inc., et al.,*
22 No. 3:24-cv-05121-CRB

23 *Doe (D.G.) v. Uber Technologies, Inc., et al.,*
24 No. 3:24-cv-05169-CRB

25 *Doe (K.H.) v. Uber Technologies, Inc., et al.,*
26 No. 3:24-cv-05174-CRB

27 *Doe (SK) v. Uber Technologies, Inc., et al.,*
28 No. 3:24-cv-05710-CRB

Doe (AM) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05765-CRB

Doe (CS) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05964-CRB

1 *Doe (GT) v. Uber Technologies, Inc., et al.,*
2 No. 3:24-cv-06051-CRB

3 *Doe (E.W.) v. Uber Technologies, Inc., et al.,*
4 No. 3:24-cv-06073-CRB

5 *Doe (J.D.) v. Uber Technologies, Inc., et al.,*
6 No. 3:24-cv-06074-CRB

7 *Doe NLG (JV) v. Uber Technologies Inc., et al.,*
8 No. 3:24-cv-08622-CRB

9 *Doe NLG (KC) v. Uber Technologies Inc., et*
10 *al., No. 3:25-cv-00072-CRB*

11 *Doe NLG (TT) v. Uber Technologies Inc., et al.,*
12 No. 3:25-cv-00075-CRB

13 *Doe NLG (PO) v. Uber Technologies Inc., et*
14 *al., No. 3:25-cv-00358-CRB*

15 *Doe NLG (LB) v. Uber Technologies, Inc., et*
16 *al., No. 3:25-cv-00365-CRB*

17 *Doe NLG (BH) v. Uber Technologies Inc., et*
18 *al., No. 3:25-cv-00369-CRB*

19 *Doe NLG (BE) v. Uber Technologies Inc., et al.,*
20 No. 3:25-cv-00401-CRB

21 *Doe NLG (KK) v. Uber Technologies, Inc., et*
22 *al., No. 3:25-cv-00673-CRB*

23 *Doe NLG (JN) v. Uber Technologies Inc., et al.,*
24 No. 3:25-cv-00715-CRB

25 *Doe NLG (KL) v. Uber Technologies, Inc., et*
26 *al., No. 3:25-cv-01265-CRB*

27 *Doe NLG (AH) v. Uber Technologies Inc., et*
28 *al., No. 3:25-cv-01266-CRB*

29 *Doe NLG (ZD) v. Uber Technologies Inc., et al.,*
30 No. 3:25-cv-01729-CRB

31 *Doe NLG (WB) v. Uber Technologies Inc., et*
32 *al., No. 3:25-cv-01799-CRB*

1 *Doe NLG (JN) v. Uber Technologies Inc., et al.*,
2 No. 3:25-cv-01818-CRB

3 *DOE NLG (AH) v. Uber Technologies Inc., et*
4 *al.*, No. 3:25-cv-02797-CRB

5 *DOE NLG (KM) v. Uber Technologies Inc., et*
6 *al.*, No. 3:25-cv-02706-CRB

7 *DOE NLG (AV) v. Uber Technologies Inc., et*
8 *al.*, No. 3:25-cv-02855-CRB

9 *DOE NLG (KM) v. Uber Technologies Inc., et*
10 *al.*, No. 3:25-cv-02856-CRB

11 *Doe NLG (BC) v. Uber Technologies Inc., et al.*,
12 No. 3:25-cv-02899-CRB

13 *Doe NLG (RR) v. Uber Technologies Inc., et al.*,
14 No. 3:25-cv-02788-CRB

15 *Doe NLG (KM) v. Uber Technologies Inc., et*
16 *al.*, No. 3:25-cv-02956-CRB

17 *Doe NLG (MH) v. Uber Technologies, et al.*,
18 No. 3:25-cv-05163-CRB

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm of Nachawati Law Group (“NLG”), representing several plaintiffs, including the above referenced plaintiffs, in MDL 3084. I am a member in good standing of the State Bar of Texas. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

2. This declaration is made in support of Certain Nachawati Plaintiffs’ Response to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s Motion Regarding Fraudulent Plaintiff Fact Sheets (ECF No. 4580) (“Certain Nachawati Plaintiffs’ Response”).

3. NLG’s records indicate that plaintiffs in cases identified in footnote 2 of Document 4522 have become unavailable or non-responsive.

4. The exhibits referred below are attached to Certain Nachawati Plaintiffs’ Response. They are filed in connection with Certain Nachawati Plaintiffs’ Administrative Motion to Seal.

5. Attached as **Exhibit 1** is a true and correct copy of Uber Ride Information Form (MDL ID 3201) 85040. This document is filed under seal.

6. Attached as **Exhibit 2** is a true and correct copy of Uber Ride Information Form (MDL ID 1496) 16464. This document is filed under seal.

7. Attached as **Exhibit 3** is a true and correct copy of Defendant Fact Sheet (MDL ID 3207) 92639. This document is filed under seal.

8. Attached as **Exhibit 4** is a true and correct copy of First Amended Defendant Fact Sheet (MDL ID 3207) 152658. This document is filed under seal.

9. Attached as **Exhibit 5** is a true and correct copy of Defendant Fact Sheet (MDL ID 1500) 18280. This document is filed under seal.

10. Attached as **Exhibit 6** is a true and correct copy of First Amended Defendant Fact Sheet (MDL ID 1500) 148100. This document is filed under seal.

11. Attached as **Exhibit 7** is a true and correct copy of Defendant Fact Sheet (MDL ID 2214) 27135. This document is filed under seal.

